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November 23, 2010

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NOV 29 2010

APCO

Director, Air and Waste Management Division  
U.S. Environmental Protection Agency  
901 N. 5<sup>th</sup> Street  
Kansas City, Ks. 66101

Dear Director,

Please find enclosed the NESHAP for Reciprocating Internal Combustion Engines (RICE) form for Employers Mutual Casualty Company's emergency generator engines. We have been accumulating this information as to 40 Code of Federal Regulations (CFR) 63.6580-63.6675 (subpartZZZZ).

Respectfully,



Harold Capps Jr.  
VP, Director of Facilities

Example<sup>a</sup>

## Initial Notification of Applicability<sup>b</sup>

National Emission Standards for Hazardous Air Pollutants:  
Stationary Reciprocating Internal Combustion Engines  
40 CFR part 63, subpart ZZZZ

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☒ Yes, I am subject to 40 CFR part 63, subpart ZZZZ National Emission Standards for  
Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

NAICS code(s): 22132

Compliance Date: ☒ Existing (before 6/12/2006) source: Oct 19, 2013

☐ New/reconstructed (on or after 6/12/2006) source: Upon initial startup

**Note: The Oct 19, 2013 compliance date for existing sources applies to the following engine types:**

- Existing stationary spark ignition (SI) RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions
- Existing stationary SI RICE located at an area source of HAP emissions

Company name: City of Davenport WWTP

Facility name (if different): \_\_\_\_\_

Facility (physical location) address: 2606 South Concord Street Davenport, IA 52801

My facility is a (please choose one): ☐ Major source ☒ Area source

Owner name/title: Dennis J. Ryan Plant Manager

Owner/company address: Davenport WPCP PO Box 3606 Davenport, IA 52808-3606

<sup>a</sup> This is an example of the type of information that must be submitted to fulfill the Initial Notification of Applicability Status requirement of 40 CFR part 63, subpart ZZZZ. You may submit the information in another form or format, or you may use this form.

<sup>b</sup> Initial Notification is due 120 days after the effective date (10/19/2010) of the rule or 120 days after you become subject to the rule